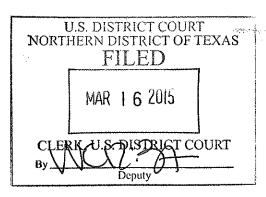
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ORIGINAL

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

RACHEL LYNN PIGOTT	§
F/K/A RACHEL LYNN BLAYLOCK,	§
Plaintiff,	§
	§
v.	§ CIVIL ACTION NO. 4:15-CV-00087-A
	§
CHASE BANK USA, N.A.	§
D/B/A CHASE,	§
Defendant.	§

UNOPPOSED MOTION FOR PROTECTIVE ORDER

TO THE HONORABLE JOHN H. MCBRYDE UNITED STATES DISTRICT JUDGE:

Chase Bank USA, N.A. ("CB USA") (the "Defendant"), files this Unopposed Motion for Protective Order and in support hereof would respectfully show the Court as follows:

- 1. Rachel Lynn Pigott f/k/a Rachel Lynn Blaylock (the "Plaintiff") commenced this lawsuit by filing her Complaint on February 5, 2015.
- 2. The parties are engaged in informal discovery and anticipate engaging in formal discovery. CB USA requests entry of a protective order to protect its confidential and proprietary information that might be disclosed in discovery. The parties have approved and agreed to the terms of a protective order for confidential information, and an Agreed Protective Order is being submitted with this Motion.

3. Plaintiff does not oppose the relief requested in this Motion and has agreed to entry of the Agreed Protective Order being submitted with this Motion.

WHEREFORE, PREMISES CONSIDERED, CB USA requests that the Court enter the Agreed Protective Order being submitted with this Motion.

Respectfully submitted,

Wm. Lance Lewis

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CERTIFICATE OF CONFERENCE

The Plaintiff does not oppose the relief requested in this Motion and has agreed to entry of the Agreed Protective Order being submitted with this Motion.

Kenneth A. Hill

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March, 2015, a true and correct copy of the foregoing document was served via certified mail, return receipt requested, on the following:

James J. Manchee Marilyn S. Altamira Manchee & Manchee, PC 12221 Merit Drive, Suite 950

Dallas, Texas 75251

Kenneth A. Hill

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